

EXHIBIT 1



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April 19, 2021

VIA E-MAIL

john.carlin@usdoj.gov

The Honorable John P. Carlin
Acting Deputy Attorney General
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-0001

Re: *United States v. Steven Donziger*, No. 19-cr-561 (S.D.N.Y.)
Chevron Corp. v. Steven Donziger, No. 11-cv-691 (S.D.N.Y.)

Dear Mr. Carlin:

I am writing to supplement my letter of April 2, 2021 asking the Department of Justice to supervise and review the criminal contempt prosecution of Steven Donziger.

I was not aware at the time I wrote the April 2 letter that the court-appointed special prosecutor has been deploying Department of Justice personnel, specifically Federal Bureau of Investigation agents, to investigate the criminal contempt charges and support the prosecution team. The special prosecutor's use of FBI personnel underscores the need for Departmental oversight over what is, in practical terms as well as a matter of law, prosecution of a federal crime. It does not seem to me that a private attorney prosecuting a criminal contempt that the U.S. Attorney has declined can command FBI resources and direct the work of FBI personnel or, for that matter, that a judge can order executive branch resources be placed at the disposal of such a special prosecutor.

I noted in my earlier letter that the special prosecutor in this case is essentially independent from Department of Justice supervision or oversight. That independence now seems to extend to her use of Federal Bureau of Investigation personnel and resources.

HONORABLE JOHN P. CARLIN
APRIL 19, 2021
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We appreciate your attention and are available to meet to discuss these matters more fully at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Taylor, III". The signature is written in a cursive, flowing style with a horizontal line at the end.

William W. Taylor, III

c: Rita Glavin